

REMARKS

Claims 1-14, 16-25 and new claims 26-33 are pending in this application. Claim 15 is cancelled as it did not distinguish over claim 14. Applicants appreciate the Examiners statement that pending claims 17-25 are allowed.

Both pending original independent claims 1 and 17 are amended to replace “a choline derivative selected from the group consisting of a bis-choline salt, a tris-choline salt, and a mixture thereof” with “a compound selected from the group consisting of a hydroxide and/or salt of bis-(2-hydroxy-ethyl)-dimethyl ammonium, a hydroxide and/or salt of tris-(2-hydroxy-ethyl)-methyl ammonium, and a mixture thereof.” The replacement of Bis-choline and tris-choline by their proper names is not believed to change the scope of the claims, as bis-choline is bis-(2-hydroxy-ethyl)-dimethyl ammonium and tris-choline is tris-(2-hydroxy-ethyl)-methyl ammonium. *See* the specification at ¶[0064].

Additionally, independent claim 1 was amended to recite that the composition is substantially free of hydroxylamine. Support for this can be found in ¶[0071] and ¶[0076].

New independent claim 29 is supported for example in ¶[0068].

New independent claim 30 and dependent claim 33 are supported in the specification at ¶¶[0055]-[0056], and are intended to encompass the Examples 1-4. Claims 30 and 33 are additionally supported in the specification by ¶[0061], ¶[0063], ¶[0064], ¶[0071], and ¶¶[0092]-[0099] containing Examples 1-4.

Dependent claims 31-33 recite a method of use of the compositions of claims 1, 29, and 30.

REJECTIONS

Claims 1, 2, 6-9, 14, and 15 stand rejected as being anticipated by USP 5,968,848.

Applicants respectfully traverse. It is not clear where in US 5,968,848 the Examiner believes bis-choline and tris-choline are specifically mentioned. The Office action recites column 4 at lines 29-49 which state in pertinent part “typical examples of of lower-alkyl quaternary ammonium bases include tetramethylammonium hydroxide, (and) trimethyl(2-hydroxyethyl)ammonium hydroxide (choline).” This reference therefore indeed discloses

remover compositions containing choline. But what was recited in the claims, and what is central to the invention, is that for such applications we found bis-choline (having two methyl and two 2-hydroxyethyl moieties) and tris-choline (having one methyl and three 2-hydroxyethyl moieties) are a significant improvement over choline (having only one 2-hydroxyethyl moiety). Applicants also note that the recitation of N,N-diethylhydroxylamine in the reference also does not disclose bis- or tris-choline. As US 5,968,848 does not teach a hydroxide and/or salt of bis-(2-hydroxy-ethyl)-dimethyl ammonium or a hydroxide and/or salt of tris-(2-hydroxy-ethyl)-methyl ammonium, Applicants respectfully request that this rejection be reconsidered and removed.

Claims 1-16 stand rejected as being anticipated by USP 6,475,966.

Applicants respectfully traverse with respect to the claims as amended. USP 6,475,966 describes in column 3 at line 18 the use of choline hydroxide. While we note that bis-choline and tris-choline are not anticipated by , this patent does disclose that

Suitable first polymer dissolution enhancing bases are any selected from tetra(C1-C6)alkylammonium hydroxide . . . Thus, for example, tetra(C1 - C4)alkylammonium hydroxide includes hydroxy(C1-C4)alkyl tri(C1-C4)alkylammonium hydroxide such as 2-hydroxyethyl trimethylammonium hydroxide, di(hydroxy(C1-C4)alkyl) di(C1-C4)alkylammonium hydroxide, tri(hydroxy(C1-C4)alkyl) (C1 -C4)alkylammonium hydroxide and tetra(hydroxy(C1-C4)alkyl)ammonium hydroxide.

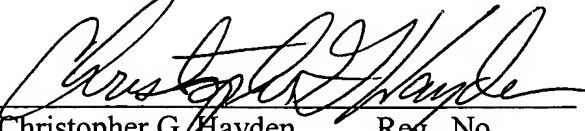
While 2-hydroxyethyl trimethylammonium hydroxide provided as an example of a hydroxy(C1-C4)alkyl tri(C1-C4)alkylammonium hydroxide the compound 2-hydroxyethyl trimethylammonium hydroxide (choline), there is no similar recitation of for example bis(2-hydroxyethyl dimethylammonium hydroxide to illustrate the class di(hydroxy(C1-C4)alkyl) di(C1-C4)alkylammonium hydroxide. Therefore, the claim 1 as recited is not anticipated by USP 6,475,966.

Additionally, claim 1 as amended is not obvious over USP 6,475,966. Claim 1 is amended to recite the composition is substantially free of hydroxylamine. USP 6,475,966 requires three components, one of which is an hydroxylamine.

No fee is believed due regarding this response, other than the required extension fees and additional claim fees, paid separately. However, should a fee be deemed necessary, the Office is authorized to charge Morgan, Lewis & Bockius LLP Deposit Account No. 50-0310.

Respectfully submitted,

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